Supreme Court, U.S.
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**Case Number- 09-1506**
**D. C. Docket No. 07-00208-CV-HLM-4**

IN THE

SUPREME COURT OF THE UNITED STATES

RANDALL M. JONES

*Petitioner*

v.

ANHEUSER BUSCH

*Respondent*

**On petition for Writ of Certiorari To The United States Court of Appeals for the Eleventh Circuit**

# Reply

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## TABLE OF CITATIONS AND AUTHORITIES

*Lilly Ledbetter Fair Pay Act of 2009, Pub. L. No.* 111-2 123 Stat. S (2009)

Cryder V. Oxendine, 24 F 30 175, 176 (11th *Cir. 2004)*

Jones V. American General Life and Accident *Ins. Co., 370F, 30 1054 (11th Cir. 2004)*

*Quality Foods De Centro America, S. A. v. Latin American Agribusiness Dev. Corp. S. A.* 711 F. 2D 989, 994-995 (11th Cir.1983)

*Tatroe v. Cobb County, GA. Civil action No. 1:04-CV-1074-WSD, 2008 WL 361010, AT * 3 (N.D.GA. Feb. 08, 2008)*.....2

Petitioner was terminated-end of pay. Two white males continued gainfully employed-receiving pay after another infraction under last chance agreement with respondent.

Petitioner had filed discovery items with the EEOC and received the right to sue. respondent had to respond to the questions from the EEOC; therefore, respondent had sufficient knowledge of the discovery.

The Lilly Ledbetter Act is ripe for the instant case. This act is a intervening change of law. This act support petitioner claim of termination-end of pay while two white males-gainfully employed still got paid. It also let you bring forth a claim that is out of the time limitation you have already filed a claim on time.
Lilly Ledbetter Fair Pay Act of 2009, Pub. L. No. 111-2, 123 Stat. 5 (2009)

Petitioner had presented both courts with a phrase I am still pursuing this case. This was to dispute a clear error of fact by Magistrate Judge Walter E. Johnson.
He used a phrase-show that he has no interest in this case. This phrase is speculation.

Petitioner used supportive evidence and the Lilly Lædbetter Act when he filed the complaint for an appeal.

A dismissal for failure to state a claim is erroneous unless it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief. Cryder V. Oxendine, 24 F 30 175, 176 (11th Cir. 2004)
Jones V. American General Life and Accident Ins. Company, 370 F, 30 10 54 (11th Cir. 2004)

In a ruling on a motion to dismiss, the court must accept the facts pleaded in the complaint as true and construe them in the light most favorable to the plaintiff.

Quality Foods DE Centro America, S.A.V. Latin America AGRi Business Dev. Corp. S.A. 711 F 2D989, 994-995 (Cir. 1983)

Petitioner was presented with order from the District Court. Within the discussion section was reason for filing for reconsideration.

"A motion for reconsideration is appropriate only where there is:
(1) Newly discovered evidence
(2) An intervening development or change in controlling law, or
(3) A need to correct a clear error of law or fact."
Tatroe V. Cobb County, GA. Civil action No. 1:04 – CV -1074 – WSD, 2008 WL 36 1010, AT *3 (N.D. GA. Feb 8, 2008)

Petitioner has not waived any rights in complaint to District Court he tried to correct a clear error of fact and in appeal he presented a change in law.